

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

v.

CHIQUETTE JACKSON,
Defendant.

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15 CR 379

Honorable Gary Feinerman

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE TO
ALLOW FOR TRAVEL**

NOW COMES, Defendant CHIQUETTE JACKSON by and through her attorney, QUINN A. MICHAELIS, and respectfully requests this Court to order that the defendant's conditions of pre-trial release be modified to allow Ms. Jackson to attend a family trip for her birthday. In support of this motion, Ms. Jackson states as follows;

1. Ms. Jackson is currently on electronic monitoring with a curfew. Her mother, Antaunett Lambert is her third-party custodian. Ms. Jackson currently has no travel restrictions as a condition of her release.
2. Mr. Jackson would like travel to Puerto Rico from March 4th to March 8th, 2021, to celebrate her birthday along with several family members. Ms. Jackson's third-party custodian, Antuanett Lambert will also accompany Ms. Jackson on the trip.
3. Ms. Jackson and her family would like to stay in an AirBNB in Puerto Rico to be able to socially distance. If the court grants Ms. Jackson's request, she will provide all contact information for this AirBNB to pretrial services once a

booking is made. Further she will provide any and all flight information to pretrial services should her request be granted

4. Both pretrial services and the government have been contacted regarding this motion and both parties object to modifying the Ms. Jackson's conditions of release to allow her to travel to Puerto Rico to celebrate her birthday.

WHEREFORE, CHIQUETTE JACKSON, by and through her attorney, QUINN A. MICHAELIS, respectfully requests this Court to order that the defendant's conditions of pretrial release be modified to allow her to travel to Puerto Rico from March 4 to March 8, 2021

Respectfully Submitted,

s/ Quinn A. Michaelis
Quinn A. Michaelis
Attorney for Chiquette Jackson
73 W. Monroe, Suite 106
Chicago, IL 60603
312-714-6920

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2021, I electronically filed the above

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with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on February 9, 2021.

By His Attorney,

s/ Quinn A. Michaelis

Quinn A. Michaelis
Attorney For Chiquette Jackson
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